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8 Attorneys for Defendants
GIGANEWS, INC., and
9 LIVEWIRE SERVICES, INC.

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
12 WESTERN DIVISION

13 PERFECT 10, INC., a California
corporation,

14 Plaintiff,

15 v.

16 GIGANEWS, INC., a Texas
17 Corporation; LIVEWIRE SERVICES,
INC., a Nevada corporation; and DOES
18 1 through 100, inclusive,

19 Defendants.

20 GIGANEWS, INC., a Texas
21 Corporation; LIVEWIRE SERVICES,
INC., a Nevada Corporation,

22 Counterclaimants,

23 v.

24 PERFECT 10, INC., a California
25 Corporation,

26 Counterdefendant.

Case No.: 11-cv-07098-AB (SHx)

DISCOVERY MATTER
Before Hon. Stephen J. Hillman

**DECLARATION OF JOSEPH S.
BELICHICK IN SUPPORT OF
DEFENDANTS GIGANEWS, INC.
AND LIVEWIRE SERVICES, INC.'S
REVISED RESPONSE TO THE
COURT'S REQUEST DURING THE
AUGUST 25, 2014 HEARING
REGARDING PERFECT 10'S
MOTION FOR SANCTIONS**

Date: August 25, 2014
Time: 2:00 p.m.
Courtroom: 550 (Roybal)

Discovery Cut-off: June 30, 2014
Pretrial Conference: January 19, 2015
Trial Date: January 27, 2015

1 I, Joseph S. Belichick, hereby declare pursuant to 28 U.S.C. § 1746 as
2 follows:

3 1. I am an associate at Fenwick & West, LLP, counsel for Defendants
4 Giganews, Inc. and Livewire Services, Inc. in this action. I submit this declaration
5 in support of Defendants' Revised Response to the Court's Request During the
6 August 25, 2014 Hearing Regarding Perfect 10's Motion for Sanctions. I have
7 personal knowledge of the facts in this declaration.

8 2. **Exhibit 1** is a copy of the Declaration of Kathleen Lu in Support of
9 Defendants' Position Regarding Joint Stipulation as to Perfect 10's Motion for
10 Sanctions (Dkt. 279), filed under seal.

11 3. **Exhibit 2** is a copy of Exhibit B to the Declaration of Kathleen Lu in
12 Support of Defendants' Position Regarding Joint Stipulation as to Perfect 10's
13 Motion for Sanctions, filed under seal.

14 4. **Exhibit 3** is a copy of Exhibit D to the Declaration of Kathleen Lu in
15 Support of Defendants' Position Regarding Joint Stipulation as to Perfect 10's
16 Motion for Sanctions, filed under seal.

17 5. **Exhibit 4** is a copy of Exhibit E to the Declaration of Kathleen Lu in
18 Support of Defendants' Position Regarding Joint Stipulation as to Perfect 10's
19 Motion for Sanctions, filed under seal.

20 6. **Exhibit 5** contains excerpts from Exhibit I to the Declaration of
21 Kathleen Lu in Support of Defendants' Position Regarding Joint Stipulation as to
22 Perfect 10's Motion for Sanctions, filed under seal.

23 7. **Exhibit 6** contains excerpts from the Joint Stipulation on Plaintiff
24 Perfect 10 Inc.'s Motion for Evidentiary Sanctions Against Defendant Giganews,
25 Inc. (Dkt. 280), filed under seal.

26 8. **Exhibit 7** is a copy of Defendants' Supplemental Memorandum on
27 Plaintiff Perfect 10, Inc.'s Motion for Evidentiary Sanctions (Dkt. 276).
28

BELICHICK DECL. ISO DEFS.' REVISED
RESPONSE TO COURT'S REQ. DURING THE
AUG. 25, 2014 HEARING